

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

S&D Trading Academy, LLC, and
S&D Global Trading, Inc.

Plaintiffs,

v.

AAFIS, INC. HELEN SHIH,
AND MARTY SHIH

Defendants.

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CIVIL ACTION NUMBER

3:06-V-00739

**NOTICE OF FILING OF SUPPLEMENTAL DECLARATION OF HELEN SHIH
IN SUPPORT OF AAFIS' MOTION TO DISMISS FOR LACK OF PERSONAL
JURISDICTION**

Comes now defendant AAFIS, Inc. ("AAFIS") and hereby gives notice of the filing of the attached supplemental declaration of Helen Shih, which is filed in support of AAFIS' previously filed motion to dismiss for lack of personal jurisdiction.

Respectfully submitted,



Ben C. Brooks

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CERTIFICATE OF SERVICE

Service of the foregoing will be accomplished automatically through a notice of electronic filing on the persons listed below.

Francis Spagnoletti
David S. Toy
401 Louisiana Street, 8th Floor
Houston, Texas 77002



Mark L. Walters

SUPPLEMENTAL DECLARATION OF HELEN SHIH

My name is Helen Shih. I am competent to give this declaration in all respects. All of the matters herein stated are true and correct and are within my own personal knowledge.

1. This Declaration is given as a supplement to my prior Declaration in this matter which I executed on February 12, 2007.

2. In Paragraph 20C of my February 12, 2007 Declaration I stated that for the last few years, AAFIS has had a relationship with Cyber Trader Corp. In addition, AAFIS has a similar relationship with Transcend Capital with offices in Dallas Texas for Transcend to serve as a broker dealer through which securities trading effected on the New York Stock Exchange and NASDAQ are executed. While it is my understanding that Transcend has its principle office in Dallas, AAFIS' contract with Transcend is international in scope, and the Texas contacts are purely fortuitous.

3. Further, with respect to the training provided to stock traders by D.J. Cleary ("Cleary") or Robert Compher ("Compher") to traders employed by Asian American Association, Shen Yang, Limit Liability Corporation ("ASY"), during the time period from July 2005 through October 2006, the total number of ASY traders on Cleary and Compher's team and the total number of traders employed by ASY, as of the last day of each month, were as follows:

Month	No. of Members of Cleary/Compher Team	Total No. of Traders Employed by ASY
07-2005	4	192
08-2005	4	234
09-2005	5	219
10-2005	16	266
11-2005	22	255
12-2005	22	299
01-2006	53	322
02-2006	55	316
03-2006	56	354
04-2006	50	339
05-2006	38	364
06-2006	45	365
07-2006	63	372
08-2006	56	362
09-2006	66	342
10-2006	64	372


The figures for Cleary and Compher's team do not include new probationary hires, but the total figures for all ASY employees do include new probationary employees. Also, the figures for the total number of employees includes those on Cleary and Compher's team.

4. As discussed in my February 12, 2007 declaration there were 28 traders who received training in Houston. Most, if not all, of the remaining traders on Cleary and Compner's team received training from Cleary or Compner in the Peoples' Republic of China ("PRC"). The traders not on Cleary and Compner's team did not receive training from Cleary or Compner. As stated in my original declaration, all of these traders were employed by ASY and all are residents of the PRC. Although I have not had the opportunity to review the relevant records prior to executing this supplemental declaration, to the best of my present recollection, some of these traders, including some of the traders trained by Cleary or Compner, are no longer employed by ASY.

5. With respect to my personal contacts with Texas. I have a personal money market account with Transcend Capital. This account is in my name and is separate from AAFIS's account with Transcend.

6. Also, at one time prior to the events giving rise to the claims in this lawsuit, and prior to the date AAFIS was created as a legal entity, I was licensed to sell, and sold, insurance products. During this time period, I obtained a Series 7 securities license. Though I do not presently utilize this license, I have maintained it as an active license since I obtained it. At present, the license is held by Transcend Capital in Dallas. I have never, however, utilized my Series 7 license while it was held by Transcend Capital or any other entity located in Texas.

Under penalty of perjury, I affirm that the foregoing is true and correct to the best of my personal knowledge this 5th day of APRIL, 2007.


Helen Shih